

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA**

**v.**

**DZHOKHAR A. TSARNAEV,  
Defendant**

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**Crim. No.13-10200-GAO**

**GOVERNMENT’S RESPONSE TO  
DEFENDANT’S MOTION FOR DISCLOSURE OF JURY RECORDS**

The United States, by and through its undersigned counsel, respectfully files this response to the motion of the Defendant, Dzhokhar Tsarnaev (“Tsarnaev”), seeking disclosure pursuant to 28 U.S.C. § 1867(d) of “all records and papers used or relied up[on]” in the selection process of the grand and petit juries during the calendar years 2011, 2012, and 2013.

Although item “j” in Tsarnaev’s motion (which requests “actual completed juror summons/qualification forms and documentation for excusals and deferrals”) does not specify that personal identifiers should be redacted, the corresponding paragraph in the proposed order (paragraph 9) does; we therefore assume that the omission of such a request in item “j” was an oversight. Provided that all personal identifiers (e.g., name, address, date of birth, home and business phone numbers, email address, employer’s name and business/employer’s address) are redacted from the requested records and paper, the government does not oppose their disclosure. We would note in this regard that jurors seeking excusals or deferrals may inadvertently reveal a great deal of other personal identifying information (e.g., the names of doctors, relatives, employers, etc.) on the questionnaire itself or in “documentation for excusals and deferrals.”

This information also should be redacted before such records are disclosed.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: /s/Nadine Pellegrini  
Nadine Pellegrini  
William D. Weinreb  
Aloke S. Chakravarty  
Assistant U.S. Attorneys

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF)

/s/Nadine Pellegrini  
Nadine Pellegrini  
Assistant United States Attorney

Date: May 27, 2014